

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

TRUEPOSITION, INC.,

Plaintiff,

v.

LM ERICSSON TELEPHONE COMPANY
(Telefonaktiebolaget LM Ericsson), QUALCOMM
INC., ALCATEL-LUCENT, S.A., THIRD
GENERATION PARTNERSHIP PROJECT a/k/a
3GPP, and EUROPEAN TELECOMMUNICATIONS
STANDARDS INSTITUTE,

Defendants.

CIVIL ACTION
2:11-cv-04574-RFK

**EXPEDITED MOTION OF DEFENDANT THIRD GENERATION
PARTNERSHIP PROJECT FOR AN ORDER EXTENDING THE
TIME TO RESPOND TO TRUEPOSITION’S MOTION TO STRIKE
AND ESTABLISHING A COORDINATED BRIEFING SCHEDULE**

Defendant Third Generation Partnership Project (“3GPP”), through counsel appearing specially in this proceeding pursuant to a special appearance noticed June 15, 2012 (Dkt. 115), submits this Motion for an Order:

1) pursuant to Fed. R. Civ. P. 6(b)(1)(A), extending the time for 3GPP to respond to TruePosition’s Motion to Strike (Dkt. 116) and establishing a coordinated briefing schedule under which 3GPP’s response to the Motion to Strike and plaintiff’s response to 3GPP’s noticed Motion for Sanctions Pursuant to Fed. R. Civ. P. 11 both will be submitted ten days after the filing of 3GPP’s Rule 11 motion, and the parties’ reply briefs will be submitted 10 days thereafter; and

2) establishing an expedited briefing schedule for the instant Motion such that TruePosition be directed to submit any opposition to this Motion on or before July 2, 2012, with any reply by 3GPP to be submitted on or before July 6, 2012.

The grounds for this Motion are set forth in the accompanying Memorandum of Law and other supporting documents.

June 25, 2012

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By: /s/ Richard S. Taffet
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CERTIFICATE OF SERVICE

I hereby certify that on June 25, 2012, I served the following on counsel of record by ECF and first class mail:

1. Expedited Motion of Defendant Third Generation Partnership Project (“3GPP”) For a Coordinated Briefing Schedule, dated June 25, 2012 (the “Motion”);
2. Memorandum of Law In Support of the Motion, dated June 25, 2012;
3. Declaration Of William S.D. Cravens In Support of the Motion, dated June 25, 2012;
4. Proposed Order establishing an expedited briefing schedule in connection with the Motion; and
5. Proposed Order granting the Motion.

/s/ Derek Care

Derek Care